RCRA Inspection Report

1) Inspectors and Authors of Report

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2) Facility Information

Kemira Chemicals, Inc.
1 Cyanamid Road
Mobile, Mobile County, Alabama 36607
EPA ID Number: ALD008175408
NAICS Code(s): 325199 – All Other Basic Organic Chemical Manufacturing
Telephone: (251) 457-6601
Website: https://www.kemira.com/

3) Responsible Official

Mr. Richard E. Ryder, Plant Manager
Phone: (251) 662-1655
Email: Richard.Ryder@Kemira.com

4) Inspection Participants

Mr. Richard E. Ryder, Kemira Plant Manager
Mr. Patrick Hodgson, Kemira EHS Manager
Ms. Edna Foreman, Kemira EHS Specialist
Mr. David Champagne, US EPA Region 4
Mr. Lanny Sasser, Alabama Department of Environmental Management (ADEM)

5) Date and Time of Inspection

June 16, 2021 at 1:00 p.m. CDT

6) Applicable Regulations

Subtitle C of the Resource Conservation and Recovery Act (RCRA) (42 U.S.C. §§ 6921 – 6939g), the Alabama Hazardous Waste Management and Minimization Act of 1978, Ala. Code § 22-30-1 *et seq*.; 40 Code of Federal Regulation (C.F.R.), Parts 260 - 270, 273 & 279, and rules 335-14-1 to

335-14-17 (2016 and 2018) of the ADEM Administrative Code (ADEM Admin. Code).

As the State's authorized hazardous waste program operates in lieu of the federal RCRA program, the citations of those authorized provisions alleged herein will be to the authorized State program; however, for ease of reference, the federal citations will follow in brackets.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(7) [40 C.F.R. § 262.17], a large quantity generator (LQG) may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, as required by Section 22-30-12(b) of the AHWMMA, Ala. Code § 22-30-12(b) [Section 3005 of RCRA, 42 U.S.C. § 6925], provided that the generator complies with the conditions listed in ADEM Admin. Code r. 335-14-3-.01(7) [40 C.F.R. § 262.17] (hereinafter referred to as the "LQG Permit Exemption").

Pursuant to ADEM Admin. Code r. 335-14-3-.01(5)(a) [40 C.F.R. § 262.15(a)], a generator may accumulate as much as 55 gallons of non-acute hazardous waste in containers at or near the point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste, without a permit or without having interim status, as required by Section 22-30-12(b) of the Alabama Hazardous Wastes Management and Minimization Act (AHWMMA), Ala. Code § 22-30-12(b) [Section 3005 of RCRA, 42 U.S.C. § 6925], and without complying with ADEM Admin. Code r. 335-14-3-.01(6)(b) or 335-14-3-.01(7)(a) [40 C.F.R. § 262.16(b) or §262.17(a)], except as required in ADEM Admin. Code r. 335-14-3-.01(5)(a)7. and 8. [40 C.F.R. § 262.15(a)(7) and (8)], provided that the generator complies with the satellite accumulation area conditions listed in ADEM Admin. Code r. 335-14-3-.01(5)(a) [40 C.F.R. § 262.15(a)] (hereinafter referred to as the "SAA Permit Exemption").

7) Purpose of Inspection

The purpose of the inspection was to conduct an unannounced RCRA compliance evaluation inspection (CEI) to determine the Kemira Chemicals, Inc. (Kemira, or facility) compliance with the conditions of its Alabama Hazardous Wastes Management and Minimization Act (AHWMMA) permit and all applicable requirements of Division 14 of the ADEM Administrative Code (Subtitle C of the Resource Conservation and Recovery Act (RCRA)).

8) Facility Description

Kemira manufactures chemical solutions for water intensive industries. The facility provides products and expertise to improve its customers' product quality, process, and resource efficiency. Kemira's focus is on pulp & paper, water treatment and oil & gas. Kemira currently employs 75 people and operates four shifts 24 hours a day, 7 days a week. According to the facility's most recent submittal of ADEM Form 8700-12 (received by the Department on January 22, 2021), Kemira is a large quantity generator of EPA hazardous waste codes: D001, D002, D003, D008, D009, U007, U008. They are also registered as a small quantity handler of universal waste.

9) Previous Inspection History

ADEM last conducted a RCRA compliance evaluation inspection (CEI) at Kemira on September 28, 2016. The following violations were identified:

- ADEM Administrative Code 335-14-6-.02(7)(c) (265.B - Interim Status Standards for Owners and Operators of HW TSDs: General Facility Standards; facility personnel must take part in annual review of initial training)

10) <u>Observations</u>

On June 16, 2021, Mr. Champagne and Mr. Sasser arrived at Kemira at approximately 1 p.m. CDT and made introductions with Mr. Hodgson and Ms. Edna Foreman. The inspectors presented credentials and explained the purpose of the inspection. The facility representatives escorted the inspectors to a conference room and conducted the opening conference. Following the opening conference, the facility representatives accompanied the inspectors on a process-based compliance evaluation inspection (CEI) of the facility.

Hydroxylated/Hydrogenlized Area (HX/HY)

Hazardous waste in this area is generated from hydroxylated polyacrylamide (PAM) emulsion filters and caustic alkali liquid. At the time of the inspection, there was one 55-gallon container of hazardous waste labeled sodium hydroxide and ammonium hydroxide. The container was labeled (labeled "hazardous waste" and with the indication of the hazardous contents), but not closed (Photograph 1 of 4).

Pursuant to ADEM Admin. Code r. 335-14-3-.01(5)(a)4 [40 C.F.R. § 262.15(a)(4)], which is a condition of the SAA Permit Exemption, a generator is required to keep containers of hazardous waste closed at all times during accumulation, except when adding, removing, or consolidating waste; or when temporary venting of a container is necessary for the proper operation of equipment, or to prevent dangerous situations, such as build-up of extreme pressure.

Emulsion Polymers

Located in this area are 2 monomer tanks that convert material to polymers. Polymers are sent to one of 6 reactors and subsequently sent to breakers where the reaction occurs. The finished product is transferred from the breakers to storage tanks. At the time of the inspection, the process was designed to generate non-hazardous waste.

Emulsion Polyacrylamide (EPAM) Tank Farm

At the EPAM tank farm, pH adjustment is made to the process water used to wash/rinse the reactors after a batch is transferred to a storage tank. The wash/rinse is either a caustic or peroxide rinse depending on the type of EPAM that was in the reactor. That rinse water is then drained to the facility's basins where it is pH adjusted before transfer to the publicly owned treatment works (POTW). The facility samples the basin water weekly for contaminants outlined in its state indirect discharge (SID) permit and its Pre-Treatment contract with Mobile Area Water and Sewer System (MAWSS). Personal protective equipment (PPE), sample jars, filters and liquid EPAM is collected here as non-hazardous waste. The EPAM waste is taken to a larger roll off container and disposed of in an industrial landfill permitted for that waste stream.

Hazardous Waste Central Accumulation Area

At the time of the inspection, there were five (5) 55-gallon blue plastic containers storing corrosive and toxic acrylamide (AMD) filter waste. All five containers were closed, labeled, and the oldest date on the container was May 26, 2021. One (1) 55-gallon black metal container was used to store HX-PAM Emulsion filter waste that was closed, labeled, and dated June 7, 2021. One approximate 250-gallon tote container was used to store off-spec AMD product (U007). This container was closed, labeled, and dated June 14, 2021. Seven (7) containers were used to store universal waste. All containers were closed, labeled, and dated June 16, 2021.

Lab

The laboratory is set up with High Performance Liquid Chromatography (HPLC) machines to conduct quality control. Mr. Joshua Thompson, Quality Specialist participated in this portion of the inspection and Mr. Richard Ryder, Plant Manager joined the CEI and remained a part of the inspection group at this time. The lab had a satellite accumulation area (SAA) set up outside the lab in a locked container. At the time of the inspection, there was one (1) 55-gallon container of hazardous waste acetone, and one (1) 55-gallon container of HPLC hazardous waste. Inside the lab, there were two (2) 4-liter containers and (2) 5-gallon containers of hazardous waste there were not labeled (Photograph 2-4 of 4).

Pursuant to ADEM Admin. Code r. 335-14-3-.01(6)(b)6.(i) [40 C.F.R. § 262.15(a)(5)], which is a condition of the SAA Permit Exemption, a generator is required to mark or label its containers (i) with the words "Hazardous Waste" and (ii) with an indication of the hazards of the contents.

The lab has an HPLC machine with a direct waste line to a non-hazardous storage tank. The inspection team requested a hazardous waste profile for the material. On June 30, 2021, Mr. Hodgson emailed the inspectors a waste profile for the HPLC material and it appears to be non-hazardous.

Bio-AMD Area

At the time of the inspection, there was a 5-gallon container of sample Bio-AMD waste that was not labeled hazardous waste.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(6)(b)6.(i) [40 C.F.R. § 262.15(a)(5)(i)], which is a condition of the SAA Permit Exemption, a generator is required to mark or label its container with the words "Hazardous Waste".

Oil Shed

At the time of the inspection, there were six (6) 55-gallon containers of used oil being stored at this location. All containers were closed and labeled.

Records

The following documents were reviewed at the time of the inspection: CAA weekly inspections (last 3 years); ADEM form 8700-12 Notification of Regulated Waste Activity; Contingency plan dated February 11, 2020: No records indicating there was a notification to local authorities.

Pursuant to ADEM Admin. Code r. 335-14-3 [40 C.F.R. § 262.16(b)(8)(vi)], which is a condition of the SQG Permit Exemption, a generator is required to (A) attempt to make arrangements with the local authorities identified, as appropriate for the type of waste handled at his facility and the potential need for the services of these authorities, and (B) maintain records documenting the arrangements made.

Hazardous waste training records: Mr. Hodgson's last training record on file was dated October 2019.

Pursuant to ADEM Admin. Code r. 335-14-3 [40 C.F.R. § 262.17(a)(7)], which is a condition of the LQG Permit Exemption, facility personnel must take part in an annual review of the initial training required by this section.

Hazardous waste manifests for the last 3 years were reviewed. The facility uses the following transporters for hazardous waste:

- Heritage Transport, LLC. EPA ID: IND058484114
- Tri-State Motor Transit EPA ID: MOD095038998

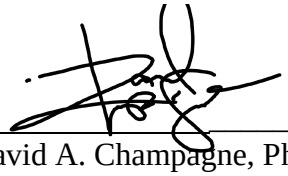
The facility utilizes the following designated facilities for hazardous waste:

- Rineco EPA ID: ARD981057870
- Heritage Thermal Services, Inc. EPA ID: OHD980613541

11) Summary

At the conclusion of the CEI, the inspectors held a closing conference with Kemira's representatives, Mr. Ryder, Plant Manager, Mr. Hodgson, EHS Manager, and Ms. Foreman, EHS Specialist. During the meeting, the inspectors presented the preliminary results of the inspection. Kemira was inspected as a large quantity generator of hazardous waste. The facility appeared to not be in compliance with some requirements of RCRA.

12) Signed



David A. Champagne, Physical Scientist

07/09/2021

Date

Concurrence

ARACELI CHAVEZ Digitally signed by ARACELI CHAVEZ
Date: 2021.07.09 15:15:32 -04'00'

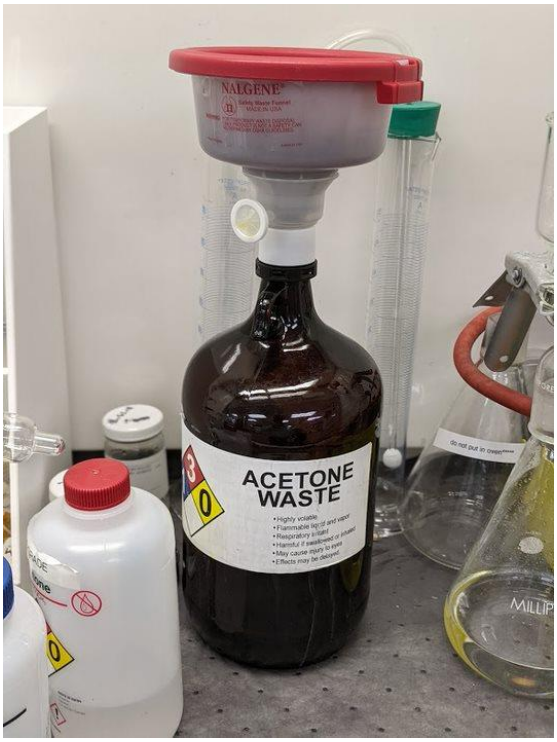
Araceli B. Chavez
Chief
RCRA Enforcement Section

Date

Photograph 1 of 4: Hydroxylated/Hydrogenlized Area (HX/HY) Hazardous Waste

Photograph 2 of 4: Lab Hazardous Waste

Photograph 3 of 4: Lab Hazardous Waste



Photograph 4 of 4: Lab Hazardous Waste